

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

PAMELA GOODNESS,)	
)	
Plaintiff,)	
v.)	Case No.: 25-cv-00293
)	
)	
WORLDWIDE UNITED HEALTHCARE, LLC,)	
ADROIT HEALTH GROUP LLC,)	
AND MERCHANTS BENEFIT)	
ADMINISTRATION,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Defendant, Adroit Health Group, LLC (“Defendant”), by and through its counsel, Partridge Snow & Hahn LLP, now removes the state court action filed by Pamela Goodness (“Plaintiff”) described below pursuant to 28 U.S.C. § 1441. In support thereof, Defendant states as follows:

1. On May 20, 2025, Plaintiff filed suit against the above Defendant, as well as Worldwide United Healthcare, LLC and Merchants Benefit Administration, Inc. in Rhode Island Superior Court for Kent County Rhode Island, which has been docketed with case number KC-2025-0603. In compliance with 28 U.S.C. § 1446(a) and Local Rule 81, a copy of all “process, pleadings, and orders” served on or by Defendant is attached hereto as *Exhibit 1*.

2. On May 21, 2025, the Defendant was served with Plaintiff’s Complaint and summons.

3. Plaintiff's action alleges that Adroit Health Group, LLC, along with the other named defendants sold her a health insurance policy, predicated upon misrepresentations of the policy's benefits provided. The Complaint contains the following Counts:

- Count I – Fraudulent Inducement
- Count II – Violation of the Rhode Island Deceptive Trade Practices Act
- Count III – Elder Abuse (Economic Exploitation)
- Count IV – Breach of Contract

DIVERSITY JURISDICTION

4. This action is a civil action over which this Court has diversity jurisdiction pursuant to 28 U.S.C § 1332(a).

5. Plaintiff is seeking compensatory damages for financial losses in excess of \$100,000.00, per the Prayer for Relief.

6. As alleged in the Complaint, Plaintiff is a Rhode Island resident, Worldwide United Healthcare is a Florida Limited Liability Company in St. Petersburg, Florida, Adroit Health Group, LLC is a Texas Limited Liability Company with its principal place of business located in Allen, Texas, and Merchants Benefit Administration, Inc. is an Arizona corporation with its principal business address in Scottsdale, Arizona. Ex. 1, Paragraphs 1-4.

7. Additionally, the members of defendants that are limited liability companies are not citizens of Rhode Island.

8. Accordingly, there is requisite diversity of citizenship and amount in controversy to invoke this Court's jurisdiction pursuant to 28 U.S.C. § 1332(a).

OTHER JURISDICTIONAL AND VENUE MATTERS

9. As required by 28 U.S.C. § 1446(d), this Notice of Removal will be served upon all parties of record and will be filed with the Rhode Island Superior Court for Kent County.

10. As required by 28 U.S.C. § 1446(b)(2)(A), Worldwide United Healthcare, LLC and Merchants Benefit Administration, Inc. have agreed and consent to removal of this action from the Rhode Island Superior Court for Kent County to the United States District Court for the District of Rhode Island.

11. The United States District Court for the District of Rhode Island is the District Court for the district encompassing Kent County, Rhode Island, pursuant to 28 U.S.C. § 120.

12. A certified copy of the state court record will be filed within 14 days of this notice pursuant to Local Rule 81.

RESERVATION OF RIGHTS

13. In filing this Notice of Removal, Defendant does not waive, and specifically reserves, any and all objections as to service, personal jurisdiction, defenses, exception, rights, and motions.

JURY DEMAND

14. Defendant demands a trial by jury.

WHEREFORE, Defendant, Adroit Health Group, LLC, does hereby give notice of removal of the action styled *Pamela Goodness v. Worldwide United Healthcare, LLC et al*, in the Rhode Island Superior Court for Kent County to the United States District Court for the District of Rhode Island.

Dated: June 20, 2025

Respectfully submitted,

ADROIT HEALTH GROUP, LLC

By Its Attorneys,

/s/ Christopher M. Wildenhain

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2025, a copy of the foregoing document has been filed electronically through the Court's CM/ECF system, is available for viewing and downloading and will be sent electronically to all registered participants identified on the Notice of Electronic Filing and by email, if available, and first-class mail, postage prepaid, to the following:

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